

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	Criminal Number: 4:20-cr-00762-SEP-
	)	DDN-1
	)	
-versus-	)	
	)	MOTION TO MODIFY
	)	CONDITIONS OF BOND
RON SAUNDERS	)	

---

Ronald Saunders, through his undersigned counsel, respectfully moves for an order modifying the conditions of the bond set in the District of South Carolina on December 10, 2020. This motion is made without objection either from Saunders' supervising probation officer in the District of South Carolina (see Exhibit A – correspondence from USPO) or from Assistant United States Attorney Jillian Anderson. Saunders' case is governed by the rebuttable presumption in favor of detention, and after a lengthy hearing on the matter, the Magistrate Judge was satisfied that Saunders could be released on conditions that would adequately assure his attendance in court and the safety of the community.

Since his release on bond, Saunders, who is self-employed as a residential real estate agent has been subject to home detention and electronic monitoring, with leave to attend to work obligations. Under the regulations applicable to home detention, requests to be out of his home must be made 72 hours in advance. Given the nature of the highly competitive residential real estate market in this area, Saunders often needs to respond to newly available homes and willing buyers within a more compressed time frame. As a result of his assiduous compliance with the probation office's scheduling requirements, he has been able to document several lost transactions since December 10, 2020. If, instead, a curfew were imposed, he could continue to have his location monitored twenty-four hours a day but would also be able to more nimbly attend

to business, without diminishing the safety of the community or appreciably increasing his presence therein.

For the foregoing reasons, Saunders respectfully moves this court for an order removing the previously imposed condition of home detention and setting a curfew from 7:30 AM until 8:00 PM, daily, due to his employment as a realtor and the schedule required for such employment.

Respectfully submitted,

BLAZER LAW FIRM  
1037 Chuck Dawley Blvd D100  
Mount Pleasant, SC 29464  
Telephone: (843) 732-4441

By: /s/ Cameron Jane Blazer  
Cameron Jane Blazer 77000 (SC)  
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the Office of the United States Attorney.

By: /s/ Cameron Jane Blazer  
Cameron Jane Blazer 77000 (SC)